

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: : Chapter 11
: Case No. 18-10509 (SHL)
: (Jointly Administered)

RICHARD LEVIN, Chapter 11 Trustee of :
FIRESTAR DIAMOND, INC., FANTASY, INC., :
and OLD AJ, INC. f/k/a/ A. JAFFE, INC., :
Plaintiff, :
v. : Adv. Proc. No. 19-1102 (SHL)
:
NIRAV DEEPAK MODI, MIHIR BHANSALI, and :
AJAY GANDHI, :
Defendants. :

X

**NOTICE OF DEFENDANT AJAY GANDHI'S MOTION
TO WITHDRAW THE REFERENCE TO THE BANKRUPTCY COURT
PURSUANT TO 28 U.S.C. § 157(d), RULE 5011(a) OF THE FEDERAL RULES
OF BANKRUPTCY PROCEDURE, AND LOCAL BANKRUPTCY RULE 5011-1**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in support of Defendant Ajay Gandhi's Motion to Withdraw the Reference with respect to the above-captioned adversary proceeding (the "Adversary Proceeding"); the Certification of Edward Schnitzer, Esq.; and all the papers filed and proceedings had herein, Ajay Gandhi ("Gandhi" or "Defendant") hereby respectfully moves the United States District Court for the Southern District of New York for an order, under 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011, and Local Bankruptcy Rule 5011-1, (the "Motion") for entry of an order withdrawing the reference of the above-captioned adversary proceeding.

Gandhi has made no previous request to this Court or to any other court for the relief requested by this motion to withdraw the reference.

PLEASE TAKE FURTHER NOTICE that any opposing affidavits and answering memoranda shall be served within fourteen days after service of the Motion.

Dated: June 21, 2022
New York, New York

**MONTGOMERY, McCRACKEN,
WALKER & RHOADS LLP**

By: /s/ Edward L. Schnitzer

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